

THE HONORABLE THOMAS S. ZILLY

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

TODD RAY JONES,
Plaintiff,
v.

NO. 2:22-cv-00572-TSZ

**MOTION AND ORDER FOR
SUBSTITUTION**

KING COUNTY, a political subdivision;
The KING COUNTY DEPARTMENT OF
ADULT AND JUVENILE DETENTION, a
department of KING COUNTY; KING
COUNTY CORRECTIONAL FACILITY –
SEATTLE, a department of the KING
COUNTY DEPARTMENT OF ADULT
AND JUVENILE DETENTION and KING
COUNTY; King County Corrections Officer
KENNETH GRANT, in his individual and
official capacity, and KENNETH and JANE
DOE GRANT, husband and wife and the
marital community comprised thereof; King
County Corrections Officer TROY
ELERICK, in his individual and official
capacity, and TROY and JANE DOE
ELERICK, husband and wife and the
marital community comprised thereof; King
County Corrections Officer KEVIN
OLSON, in his individual and official
capacity, and KEVIN and JANE DOE
OLSON, husband and wife and the marital
community comprised thereof; King County
Corrections Sergeant GRADY CONNER, in
his individual and official capacity, and
GRADY and JANE DOE CONNER,

husband and wife and the marital community comprised thereof; King County Corrections Major TODD CLARK, in his individual and official capacity, and TODD and JANE DOE CLARK, husband and wife and the marital community comprised thereof; and King County Corrections Captain BARCLAY PIERSON, in his individual and official capacity, and BARCLAY and JANE DOE PIERSON, husband and wife and the marital community comprised thereof,

Defendants.

I. MOTION

COMES NOW, Plaintiff Todd Ray Jones, by and through his undersigned counsel, to respectfully move this Court for an order substituting “Darla Jean Stallings as Administrator of The Estate of Todd Ray Jones” for Plaintiff in this matter, Todd Ray Jones, who is now deceased.

Ms. Darla Jean Stallings (“Ms. Stallings”), Administrator of the Estate of Todd Ray Jones, shows to the Court that:

1. Todd Ray Jones, the Plaintiff in this action, died intestate on September 16, 2022.
2. Letters of Administration were issued to Ms. Stallings, as Administrator of the Estate of Todd Ray Jones, by Superior Court of the State of Washington, in and for the County of King, Cause No. 22-4-08284-1 SEA, on December 14, 2022.
3. Darla Jean Stallings is duly qualified and is now acting as Administrator of the Estate of Todd Ray Jones and is now the representative of Todd Ray Jones, the now-deceased Plaintiff.
4. This action is not extinguished by the death of Todd Ray Jones, Plaintiff; and
5. No party herein filed and/or served a suggestion of death. *See* Fed. R. Civ. P. Rule 25.

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1 DATED this 18th day of January 2023.

2
3 TOMLINSON BOMSZTYK RUSS

4 By: AM
5 Blair M. Russ, WSBA #40374
6 Anthony S. Marinella, WSBA #55611
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12
13 **II. ORDER**

14 Consistent with the motion set forth above, and pursuant to Fed. R. Civ. P. 25, it is
15 ordered that Darla Jean Stallings, as Administrator of The Estate of Todd Ray Jones, be and is
16 substituted as a party-plaintiff in the place and stead of Plaintiff, Todd Ray Jones, deceased.

17 Based on the foregoing, IT IS SO ORDERED.

18 Dated this 6th day of February, 2023.

19
20 Thomas S. Zilly

21 Thomas S. Zilly
22 United States District Judge
23

24 Presented by:
25 TOMLINSON BOMSZTYK RUSS

26 By: AM
27 Blair M. Russ, WSBA #40374
28 Anthony S. Marinella, WSBA #55611
29 Attorneys for Plaintiff